

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

MERAV PERLSTEIN

Plaintiff,

v.

SAATCHI & SAATCHI HEALTHCARE
INNOVATIONS, PUBLICIS HEALTHCARE
COMMUNICATIONS GROUP, INC.,
PUBLICIS GROUPE, SA and SAATCHI &
SAATCHI HEALTHCARE
COMMUNICATIONS, INC.

Defendants.

No. 2:13-cv-00707-AB

**STIPULATION OF DISMISSAL OF SAATCHI & SAATCHI HEALTHCARE
INNOVATIONS AND PUBLICIS GROUPE, SA AS PARTIES**

By and through their undersigned counsel, Plaintiff Merav Perlstein and Defendants Saatchi & Saatchi Healthcare Innovations, Publicis Healthcare Communications Group, Inc., Publicis Groupe, SA and Saatchi & Saatchi Healthcare Communications, Inc. (collectively, “Defendants”), hereby stipulate and agree as follows:

1. Defendants represent that Plaintiff was employed by Saatchi & Saatchi Healthcare Communications, Inc. and Publicis Healthcare Communications Group, Inc. within this District during the time pertinent to this action and agree that they are proper party defendants in this action.

2. Defendants represent that Plaintiff was never employed by Saatchi & Saatchi Healthcare Innovations or Publicis Groupe, SA and agree that, if dismissed from this action, they (individually and/or collectively) will satisfy any judgment entered against one or more

remaining defendants to the extent such remaining defendant or defendants fail to promptly satisfy any such judgment.

3. All of Plaintiff's claims asserted in this action against Saatchi & Saatchi Healthcare Innovations are hereby DISMISSED with prejudice and Saatchi & Saatchi Healthcare Innovations is hereby DISMISSED with prejudice from this action as a defendant, with each party to bear its own costs;

4. All of Plaintiff's claims asserted in this action against Publicis Groupe, SA are hereby DISMISSED with prejudice and Publicis Groupe, SA is hereby DISMISSED with prejudice from this action as a defendant, with each party to bear its own costs;

5. To the extent that Saatchi & Saatchi Healthcare Innovations and/or Publicis Groupe, SA contributed in any way to Plaintiff's claims asserted in this action, Saatchi & Saatchi Healthcare Communications, Inc. and Publicis Healthcare Communications Group, Inc. are fully responsible for any such conduct of Saatchi & Saatchi Healthcare Innovations and Publicis Groupe, SA or any employee of Saatchi & Saatchi Healthcare Innovations or Publicis Groupe, SA.

6. The caption in this action shall be amended to reflect the removal of Saatchi & Saatchi Healthcare Innovations and Publicis Groupe, SA as defendants.

/s/ Scott B. Goldshaw

Scott B. Goldshaw, Esquire
Salmanson Goldshaw, P.C.
Two Penn Center
1500 JFK Boulevard, Suite 1230
Philadelphia, PA 19102

Attorney for Plaintiff

Dated: April 10, 2013

/s/ Stephanie J. Peet

Stephanie J. Peet, Esquire
Samantha Sherwood Bononno, Esquire
JACKSON LEWIS LLP
1601 Cherry Street, Suite 1350
Three Parkway
Philadelphia, PA 19102

Attorneys for Defendants Saatchi & Saatchi
Science, Saatchi & Saatchi Healthcare
Innovations, Publicis Healthcare
Communications Group, Inc., Publicis Groupe,
SA and Saatchi & Saatchi Healthcare
Communications, Inc.

Dated: April 10, 2013

APPROVED BY THE COURT:

J.

Dated: _____